

**EXHIBIT A: FACT AND EXPERT DISCOVERY OCCURRING ON OR AFTER JUNE 24, 2011**

**FACT DISCOVERY**

**DEPOSITIONS: FACT WITNESSES (TAKEN BETWEEN JUNE 24, 2011 AND FEBRUARY 21, 2012)**

Date of Deposition	Name of Witness
6/28/2011	Scott F. Smith (on behalf of Covington & Burling LLP)
6/28/2011	David B.H. Martin (on behalf of Covington & Burling LLP)
6/28/2011	Chinh E. Chu
8/12/2011	Donald Shandy
8/25/2011	Robert John Powell (on behalf of Powell Law Group)
9/13/2011	Grady F. Tollison, Jr. (on behalf of Tollison Law Firm, P.A.)

**EXPERT DISCOVERY**

**PRODUCTION OF PLAINTIFFS' EXPERT REPORTS**

Date Initial Report Produced	Date Rebuttal Report Produced	Name of Expert
6/24/2011	11/3/2011	James R. Fisher
6/24/2011	11/3/2011	Robert J. Rock
N/A	11/3/2011	Steven E. Evans
6/24/2011	12/2/2011	Denise Neumann Martin
N/A	12/16/2011	Owen A. Lamont
N/A	12/16/2011	Todd R. Snyder
6/24/2011	12/16/2011	Neil M. Ram
6/24/2011	12/16/2011	Jack F. Williams
6/24/2011	12/16/2011	Grant W. Newton

**PRODUCTION OF DEFENDANTS' EXPERT REPORTS**

Date Response Report Produced	Date Surrebuttal Report Produced	Name of Expert
9/26/2011	2/10/2012	John M. Riley
9/26/2011	12/5/2011	Terrence M. Clauretie
9/26/2011	1/17/2012	Gary L. Cianfichi
9/26/2011	1/17/2012	David P. Stowell
10/21/2011	N/A	Thomas Vasquez
11/3/2011	2/1/2012	Jeff D. Balcombe
11/3/2011	2/3/2012	Daniel R. Fischel
11/3/2011	1/17/2012	Neil S. Shifrin/Richard L. White

**DEPOSITIONS: EXPERT WITNESSES (TAKEN BETWEEN JUNE 24, 2011 AND FEBRUARY 21, 2012)**

Date of Deposition	Expert Retained By:	Name of Expert
12/14/2011	Defendants	Thomas Vasquez
01/04/2012	Defendants	Terrence M. Clauretie
01/31/2012	Defendants	David P. Stowell
02/16/2012	Defendants	Neil S. Shifrin
02/17/2012	Defendants	Richard L. White
12/13/2011	Plaintiffs	Denise Neumann Martin
12/13/2011	Plaintiffs	James R. Fisher
01/05/2012	Plaintiffs	Steven E. Evans
02/08/2012	Plaintiffs	Neil M. Ram
02/14/2012	Plaintiffs	Grant W. Newton